

**BUTZEL LONG**  
ATTORNEYS AND COUNSELORS

*a professional corporation*

US EPA RECORDS CENTER REGION 5



410962

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butzel.com

RECEIVED JUL 10 2012 *gd*

VIA EMAIL AND VIA FIRST-CLASS MAIL

July 5, 2012

Ms. Marsha Adams  
U.S. Environmental Protection Agency  
Enforcement Services Section 1, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
[Adams.marsha@Epa.gov](mailto:Adams.marsha@Epa.gov)

**Re: Henry Ford Community College Response for Undated Request for Information Pursuant to Section 104 of CERCLA Received on or about June 12, 2012 for the Texas Township Drum Site, Kalamazoo, Kalamazoo County, Michigan; CERCLIS ID: MIN000510313**

Dear Ms. Adams:

We are the attorneys for, and are writing this letter on behalf of, Henry Ford Community College (HFCC), 5101 Evergreen Road, Dearborn, Michigan 48123. HFCC, with its consultant, *arch environmental group* (AEG), has completed an investigation of available records and conducted interviews with available HFCC personnel pursuant to the above described matter. This response was prepared and submitted by July 5, 2012, as required in your June 27, 2012 e-mail.

HFCC searched its facility file and records for any information on transactions with Environmental Network, Inc. (ENI), Chemical Assistance, Inc. (CAI) or Donald Haugen (collectively, the Target Entities) from 1987 (year of incorporation of Target Entities based on State of Michigan business records) to 2008 (year of fire at the Texas Township Drum Site). This response is organized in the order outlined in Enclosure B of the RFI.

i) Identify all persons consulted in the preparation of the answers to these Information Requests.

- Mr. Allen Gigliotti, Director – Buildings & Grounds, HFCC (in-person/e-mail)
- Ms. Marjorie Swan, Vice President & Controller, HFCC (phone/e-mail)
- Mr. David Cunningham, Director – Financial Services, HFCC (e-mail)
- Mr. Sam Greco, Physical Plant Engineer, HFCC (record search only- see iii)
- Mr. Anthony Parker, Project Manager, HFCC (HFCC e-mail)

ii) Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

The documents searched were:

- HFCC financial records system
- MDEQ on-line manifest records for HFCC sites from 1987 to 2008
- HFCC facility file records from 1987 to 2008

Attached as Exhibit A are the applicable manifests and requisition forms. There were no applicable MDEQ on-line manifest records.

iii) If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

- Available historic facility file records from Mr. Sam Greco, Physical Plant Engineer, were reviewed during this investigation. However, Mr. Greco was not interviewed personally, as due to the death of his Mother he was out of the office and will be unavailable until approximately July 9, 2012. Mr. Greco has had responsibility for various HFCC waste management operations, extending back to approximately 1990. Upon his return, Mr. Greco will be interviewed to determine if he has any additional information regarding transactions between HFCC and the Target Entities. In accordance with EPA instructions, if any pertinent information or documents from Mr. Greco become known or available after submittal of this response, an amendment will be provided.

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iv) Did you ever enter into an oral or written contract or otherwise do business with Chemical Assistance, Inc., Environmental Network, Inc., or Donald Haugen for the purpose of arranging for the storage, treatment or disposal of waste materials?

- There are no contracts with any of the related entities other than the attached requisition forms dated June 16, 1990, April 2, 1991, and September 24, 1991. See attached.

If you did, please identify the following:

a) The persons with whom you or such other persons made such arrangements;

- Refer to Exhibit A. No other contract exists to HFCC's knowledge.

b) The contact information for each person with whom such arrangements were made;

- Refer to Exhibit A. No other contract exists to HFCC's knowledge.

c) Every date on which such arrangements took place;

- Refer to Exhibit A. No other information on arrangement dates is available.

d) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the substance was used or the process which generated the substance;

- Refer to Exhibit A for descriptions of the materials. Based on Exhibit A, the waste material consisted primarily of animal parts used by the students in laboratory class, syringes, and other related non-hazardous "lab pack" waste.

e) The owner of the waste materials or hazardous substances so accepted or transported;

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- Upon information and belief, all the waste was generated by HFCC's students during laboratory classes.
- f) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- See Exhibit B, which is a summary of the attached manifests.
- g) All tests, analyses and analytical results concerning the waste materials;
- No test data or analytical data from the period are available related to the shipments described in the attachments.
- h) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- Based on interviews with the HFCC personnel named above, HFCC did not select the Site.
- i) The amount paid in connection with each transaction, the method of payment and the identity of the person from whom payment was received;
- Between 1987 and 2002, accounts payables were administered by the Dearborn Public Schools for the HFCC. HFCC contacted Dearborn Public Schools to determine if the financial records for this period are available for review and is waiting for a response. From 2002 to present, HFCC administered its own accounts payable. A review of those records show that there was no business done with, nor payments made to, the Related Entities.
- j) Where the person identified in g. (*sic, should be h*) above intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- Not applicable.
- k) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

- Refer to Exhibit A. No other information is available regarding transshipments or any intermediate storage locations of the non-hazardous waste.
- l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- Refer to Exhibit A. No other information is available regarding any alternate final disposition locations for the identified non-hazardous waste.
- m) The measures taken by you to determine the actual methods, means and site of treatment or disposal of the waste material and hazardous substances involved in each transaction;
- HFCC has no records or information in response to this question. However, diligent efforts are made throughout the purchasing process to identify reputable and licensed suppliers for use when shipping and disposing of wastes and potentially hazardous materials.
- n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
- Refer to Exhibit A (copies of the documents) and Exhibit B (summary chart of material).
- o) The price paid for (i) transport or (ii) disposal of (iii) or both, of each waste material and hazardous substance;
- Refer to subsection iv) i) above.
- p) All documents containing information responsive to a)-p) above, or in lieu of identification of all relevant documents, provide copies of all such documents;
- See Exhibit A.

July 5, 2012  
HFCC EPA RFI Response  
Texas Township Drum Site

q) All persons with knowledge, information or documents responsive to questions a through p, above.

- Refer to response to question i) and iii) above.

Please contact me if you have any questions.

Respectfully,



BETH S. GOTTHELF

TP  
Enclosures

copy to: Ms. Marjorie Swan, HFCC  
Mr. Peter Dahlgren, Arch Environmental Group

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CHECK APPROPRIATE BOX:  
☐ Materials - Supplies - Equipment  
☐ Purchased Services  
☐ Repairs

# Henry Ford Community College REQUISITION

81527

80745

Ref No.

OFFICE USE ONLY  
 SR ☐ AR ☐ PO ☐ MR ☐ TO ☐

July 16, 1990  
 DATE

Business Services

D /DEPT.

PHONE EXT.

ROOM NO.

VENDOR NAME

ADDRESS

QUANTITY	ITEM & DESC. - on Repair Request, List Make - Model - Serial No.	CAT/CODENO.	UNIT PRICE	TOTAL
	To dispose of chemicals from the Science			
	Building - Room S-6. See attached list.			
	Contact Joe Maguire			

**NOTICE**

ALL INVOICES OR PACKING SLIPS RECEIVED  
 WITH SHIPMENT MUST BE FORWARDED TO  
 THE BUSINESS OFFICE.

SPECIAL INSTRUCTIONS - Nature of Problem &amp; Location on Repair Order

DELIVER TO

SPECIAL DELIVERY DATE IF NECESSARY

SPECIAL GRANT NO.

BUDGET ACCT. NO.

REQUESTED BY

DEPT./DIV HEAD

DEAN

APPROVED - Business Office

WHITE COPY: THROUGH PROPER CHANNELS TO BUSINESS OFFICE.

YELLOW COPY RETAIN WHEN DELIVERY OR SERVICE HAS BEEN  
 COMPLETED SIGN AND FORWARD TO BUSINESS OFFICE.

GREEN COPY: RETAIN FOR YOUR FILE.



# WARNING-HAZARDOUS MATERIALS

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible pencil, or in carbon and retained by the Agent. —ORIGINAL—NON NEGOTIABLE

Shipper's No. 91213

Carrier's No. \_\_\_\_\_

NAME OF CARRIER Chemical Assistance, Inc.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

AT

FROM

Date December 14 1990

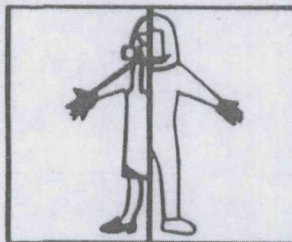
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shippers and accepted for himself and his assigns.

CONSIGNEE TO <u>Environmental Network, Inc.</u>		EXEMPTION # <u>Conditional</u>	SEAL #
ADDRESS <u>63 Dixie Highway</u>		ROUTE FINAL DESTINATION	
CITY <u>Rossford</u>	STATE <u>OH</u>	ZIP <u>43460</u>	
EMERGENCY CONTACT: <u>(800)-535-6650</u>		CAR OR VEHICLE LICENSE # NO.	

NO. & TYPES OF PKGS.	HAZ. MAT.	PROPER DOT SHIPPING NAME AS SHOWN IN 172.101 49CFR (See back for emergency response info)	CONSTITUENTS WHEN N.O.S SHIPPING NAME USED IN PARENTHESES	HAZARD CLASS UN/NA NUMBER(S)	*"POISON" & "INH. HAZARD" IF LC50. NAMES OF HAZARDOUS SUBSTANCE(S) IF "RQ"	*WEIGHT (SUBJECT TO CORRECTION)	"RQ" VALUE & EMERGENCY RESP. GUIDE #
25		Non-regulated	Biological Specimens	Combustible Liquid NA 1993		90 lbs	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
							<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
							<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
							<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #

WHERE CHECKED-USE THE PROTECTIVE EQUIPMENT AND CLOTHING IF EXPOSED TO THIS MATERIAL IN USE OR IN AN EMERGENCY

- ☐ Hard Hat
- ☐ Safety Glasses
- ☐ Safety Goggles
- ☐ Full Face Shield
- ☐ Protective Gloves
- ☐ Splash Apron
- ☐ Protective Boots



- ☐ Respiratory Protection
- ☐ Air-purifying Respirator Type \_\_\_\_\_
- ☐ Fully Encapsulated Suit
- ☐ Atmosphere-Supplying Respirator Type \_\_\_\_\_

WHEN "RQ" QUANTITY RELEASED INTO ENVIRONMENT, IMMEDIATELY NOTIFY NAT. RESPONSE CENTER - 800-424-8802 AND 911 EMERGENCY SYSTEM OR LOCAL OPERATOR.

SPECIAL MARKINGS OR INSTRUCTIONS

SHIPPER'S CERTIFICATION This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Signature [Signature] Title General

PLACARDS PROVIDED OR AFFIXED

N/A

SHIPPER'S CHECK LIST

<input checked="" type="checkbox"/> DOT LABELS APPLIED AND SECURE	<input checked="" type="checkbox"/> DOT AUTHORIZED CONTAINERS
<input checked="" type="checkbox"/> PROPER DOT NAME ON ALL PACKAGES	<input checked="" type="checkbox"/> CHECKED FOR PROPER SEALING

\* IF LC50 - ENTER "POISON- INHALATION HAZARD"  
IF "RQ" IN ONE CONTAINER - ENTER NAMES OF HAZARDOUS SUBSTANCE(S) IN PARENTHESES

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:  
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

If charges are to be prepaid write or stamp here "To be Prepaid."

Received \$ \_\_\_\_\_ to apply in prepayment of the charges on the property described herein.

Agent or Cashier

Per [Signature]  
(The signature here acknowledges only the amount prepaid)

Charges advanced:

C.O.D. charge to be paid by

Shipper

☐

Consignee

☐

SHIPPER Henry Ford Community College

ADDRESS 4842 Lois Avenue

CITY Dearborn

STATE MI 48126

TELEPHONE

PER [Signature]

PERMANENT POST OFFICE ADDRESS OF SHIPPER

SIGNATURE

PRINTED IN U.S.A.

AGENT Mr. Fred Steiner

PER

NUMBER

2

Transportation Skills Program  
243 West Main Street  
Kutztown, Pennsylvania 19530  
Copyright © 1989

HAZARDOUS MATERIALS



# WARNING-HAZARDOUS MATERIALS

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible pencil, or in carbon and retained by the Agent. —ORIGINAL—NON NEGOTIABLE

Shipper's No. 91123

Carrier's No. \_\_\_\_\_

NAME OF CARRIER Chemical Assistance, Inc.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

AT \_\_\_\_\_ FROM \_\_\_\_\_ Date Jan. 23 1991

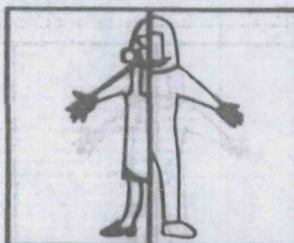
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shippers and accepted for himself and his assigns.

CONSIGNEE TO <u>Environmental Network, Inc.</u>		EXEMPTION #	SEAL #
ADDRESS <u>63 Dixie Highway</u>		ROUTE	FINAL DESTINATION
CITY <u>Rossford</u>	STATE <u>OH</u>	ZIP <u>43460</u>	INTERLINE CARRIER
EMERGENCY CONTACT: (800)-535-6650		CAR OR VEHICLE LICENSE #	NO.

NO. & TYPES OF PKGS.	HAZ. MAT.	PROPER DOT SHIPPING NAME AS SHOWN IN 172.101 49CFR (See back for emergency response info)	CONSTITUENTS WHEN N.O.S SHIPPING NAME USED IN PARENTHESES	HAZARD CLASS UN/NA NUMBER(S)	"POISON" & "INH. HAZARD" IF LC50. NAMES OF HAZARDOUS SUBSTANCE(S) IF "RQ"	"WEIGHT" (SUBJECT TO CORRECTION)	"RQ" VALUE & EMERGENCY RESP. GUIDE #
3	A	Non-Regulated Solid	( Biological Specimens )	None		306 lb	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
	B						<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
	C						<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
	D						<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #

WHERE CHECKED-USE THE PROTECTIVE EQUIPMENT AND CLOTHING IF EXPOSED TO THIS MATERIAL IN USE OR IN AN EMERGENCY

- ☐ Hard Hat
- ☒ Safety Glasses
- ☒ Safety Goggles
- ☐ Full Face Shield
- ☐ Protective Gloves
- ☐ Splash Apron
- ☐ Protective Boots



- ☐ Respiratory Protection
- ☐ Air-purifying Respirator Type \_\_\_\_\_
- ☐ Fully Encapsulated Suit
- ☐ Atmosphere-Supplying Respirator Type \_\_\_\_\_

WHEN "RQ" QUANTITY RELEASED INTO ENVIRONMENT, IMMEDIATELY NOTIFY NAT. RESPONSE CENTER - 800-424-8802 AND 911 EMERGENCY SYSTEM OR LOCAL OPERATOR.

SPECIAL MARKINGS OR INSTRUCTIONS

SHIPPER'S CERTIFICATION This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Signature \_\_\_\_\_

Title \_\_\_\_\_

PLACARDS PROVIDED OR AFFIXED

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight." NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \_\_\_\_\_

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor) \_\_\_\_\_

If charges are to be prepaid write or stamp here "To be Prepaid."

Received \$ \_\_\_\_\_ to apply in payment of the charges on the property described herein.

Agent or Cashier \_\_\_\_\_

Per \_\_\_\_\_ (The signature here acknowledges only the amount prepaid)

Charges advanced: \$ \_\_\_\_\_

C.O.D. charge to be paid by Shipper ☐

Consignee ☐

SHIPPER'S CHECK LIST

DOT LABELS APPLIED AND SECURE	<input checked="" type="checkbox"/>	DOT AUTHORIZED CONTAINERS	<input checked="" type="checkbox"/>
PROPER DOT NAME ON ALL PACKAGES	<input checked="" type="checkbox"/>	CHECKED FOR PROPER SEALING	<input checked="" type="checkbox"/>
* IF LC50 - ENTER "POISON- INHALATION HAZARD"			
IF "RQ" IN ONE CONTAINER - ENTER NAMES OF HAZARDOUS SUBSTANCE(S) IN PARENTHESES			

SHIPPER Henry Ford Community College

AGENT Mr. Fred Steiner

ADDRESS 4842 Lois Avenue

PER \_\_\_\_\_

CITY Dearborn

STATE MI 48126

NUMBER 2

TELEPHONE (313) 845-9602

PER Dr. Shuan C. M. D. Jones

PERMANENT POST OFFICE ADDRESS OF SHIPPER

SIGNATURE

PRINTED IN U.S.A.

Transportation Skills Program  
243 West Main Street  
Kutztown, Pennsylvania 19530  
Copyright © 1989

# HAZARDOUS MATERIALS

CHECK APPROPRIATE BOX  
☐ Materials - Supplies - Equipment  
☒ Purchased Services  
☐ Repairs

# Henry Ford Community College REQUISITION

79962

Ref No P.O. 87546

OFFICE USE ONLY  
SRC ARB POB MRC TOC

4-2-91  
DATE

Chem Assistant Inc

DIVISION, DEPT

PHONE EXT

ROOM NO.

VENDOR NAME

ADDRESS

QUANTITY	ITEM & DESC. - on Repair Request, List Make - Model - Serial No.	CAT. CODE NO.	UNIT PRICE	TOTAL
	To Furnish labor, material & equipment to dispose of to medical waste:			
	(A) Blood samples (liquid human)			
	(B) "Sharps" (needles & syringes)			
	Through proper segregation, packing, labeling, and transporting and off-site disposal.			
	Contact Sam Greco 845-9602 prior to pick-up.			

## NOTICE

ALL INVOICES OR PACKING SLIPS RECEIVED  
WITH SHIPMENT MUST BE FORWARDED TO  
THE BUSINESS OFFICE.

SPECIAL INSTRUCTIONS - Nature of Problem & Location on Repair Order

DELIVER TO

SPECIAL DELIVERY DATE IF NECESSARY

SPECIAL GRANT NO

BUDGET ACCT NO

REQUESTED BY

DEPT DIV HEAD

DEAN

APPROVED Business Office

WHITE COPY THROUGH PROPER CHANNELS TO BUSINESS OFFICE

YELLOW COPY RETAIN WHEN DELIVERY OR SERVICE HAS BEEN  
COMPLETED SIGN AND FORWARD TO BUSINESS OFFICE

GREEN COPY RETAIN FOR YOUR FILE



**Chemical Assistance, Inc.**

3157 Packard  
Suite A  
Ann Arbor, Michigan 48108



*Turni Stollsteimer*  
*- Pgs a Sharps*  
*↓*  
*cc 77527*  
*pc 87506*

Henry Ford Community College  
Purchasing Department  
5101 Evergreen Road  
Dearborn, MI 48128-1495

ATTN: Mr. Fred Steiner

H.F.C.C.

APR 11 1991

Purchasing/  
Acc



# WARNING-HAZARDOUS MATERIALS

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible pencil, or in carbon and retained by the Agent. —ORIGINAL—NON NEGOTIABLE

Shipper's No. 9141

Carrier's No. \_\_\_\_\_

NAME OF CARRIER Chemical Assistance, Inc.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

AT

FROM

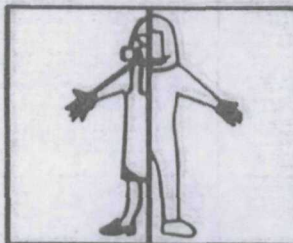
Date April 2, 1991

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shippers and accepted for himself and his assigns.

CONSIGNEE TO <u>Environmental Network, Inc.</u>				EXEMPTION # _____ SEAL # _____			
ADDRESS <u>63 Dixie Highway</u>				ROUTE _____ FINAL DESTINATION _____			
CITY <u>Rosford</u>		STATE <u>OH</u>	ZIP <u>43460</u>	INTERLINE CARRIER _____			
EMERGENCY CONTACT: (800) - 535-6650				CAR OR VEHICLE LICENSE # _____ NO. _____			
NO. & TYPES OF PKGS.	HAZ. MAT.	PROPER DOT SHIPPING NAME AS SHOWN IN 172.101 49CFR (See back for emergency response info)	CONSTITUENTS WHEN N.O.S SHIPPING NAME USED IN PARENTHESES	HAZARD CLASS UN/NA NUMBER(S)	* "POISON" & "INH. HAZARD" IF LC50. NAMES OF HAZARDOUS SUBSTANCE(S) IF "RQ"	"WEIGHT (SUBJECT TO CORRECTION)	"RQ" VALUE & EMERGENCY RESP. GUIDE #
1	A	Non-regulated Solid	( Biological Specimens )	None		50 lb.	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 ERG # _____
1	B	Non-Regulated Liquids	( Sharps and Vacutubes )	NONE		25 lb.	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 ERG # _____
	C		( )				<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 ERG # _____
	D		( )				<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 ERG # _____

WHERE CHECKED-USE THE PROTECTIVE EQUIPMENT AND CLOTHING IF EXPOSED TO THIS MATERIAL IN USE OR IN AN EMERGENCY

- ☐ Hard Hat
- ☐ Safety Glasses
- ☐ Safety Goggles
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- ☐ Protective Gloves
- ☐ Splash Apron
- ☐ Protective Boots



- ☐ Respiratory Protection
- ☐ Air-purifying Respirator Type \_\_\_\_\_
- ☐ Fully Encapsulated Suit
- ☐ Atmosphere-Supplying Respirator Type \_\_\_\_\_

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SPECIAL MARKINGS OR INSTRUCTIONS

SHIPPER'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Signature [Signature] Title Director

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Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse to the consignor, the consignor shall sign the following statement:  
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor)

If charges are to be prepaid write or stamp here "To be Prepaid."

Received \$ \_\_\_\_\_ to apply in prepayment of the charges on the property described herein.

Agent or Cashier  
Per [Signature]  
(The signature here acknowledges only the amount prepaid)

Charges advanced:

C.O.D. charge to be paid by Shipper ☐

Consignee ☐

PLACARDS PROVIDED OR AFFIXED

SHIPPER'S CHECK LIST

<input checked="" type="checkbox"/> DOT LABELS APPLIED AND SECURE	<input checked="" type="checkbox"/> DOT AUTHORIZED CONTAINERS
<input checked="" type="checkbox"/> PROPER DOT NAME ON ALL PACKAGES	<input checked="" type="checkbox"/> CHECKED FOR PROPER SEALING
* IF LC50 - ENTER "POISON- INHALATION HAZARD"	
IF "RQ" IN ONE CONTAINER - ENTER NAMES OF HAZARDOUS SUBSTANCE(S) IN PARENTHESES	

SHIPPER Henry Ford Community College

ADDRESS 4842 Lois Avenue

CITY Dearborn

STATE MI ZIP 48126

TELEPHONE (313) 845-9602

PER [Signature]

PERMANENT POST OFFICE ADDRESS OF SHIPPER

SIGNATURE

PRINTED IN U.S.A.

AGENT Mr. Fred Steiner

PER

NUMBER

**2**

Transportation Skills Program  
243 West Main Street  
Kutztown, Pennsylvania 19530  
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HAZARDOUS MATERIALS





## Chemical Assistance, Inc.

3157 Packard • Suite A • Ann Arbor, Michigan 48108 • (800) 535-6650

May 8, 1991

Mr. Terry Stollsteimer  
Director  
Buildings & Grounds  
Henry Ford Community College  
4842 Lois Avenue  
Dearborn, MI 48128-1495

Dear Mr. Stollsteimer;

Chemical Assistance, Inc. would like to inform you of our new address starting on May 20, 1991. It will be:

CHEMICAL ASSISTANCE, INC.

221 DINO DRIVE, SUITE A

ANN ARBOR, MICHIGAN 48103

As for contacting us on the telephone, our toll-free number will remain the same: (800) 535-6650. We will have a new facsimile number and it will be (313) 426-9190. Please make note of these changes and if you have any questions, please feel free to contact us.

Sincerely,

*Lisa M. Fookes*  
Lisa M. Fookes  
Customer Relations Manager

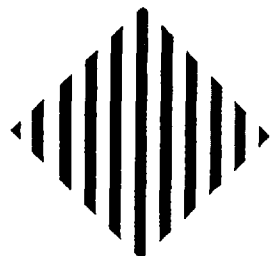
LMF/11

RECEIVED

MAY 21 1991

8:31:17  
ANN ARBOR, MICHIGAN

**Examples of Materials  
Handled by  
Chemical Assistance, Inc.**



- Pyrophorics
- Heavy Metals
- Flammable Solids
- Reactive Chlorides
- Unknowns
- Solvents
- Acids
- Bases
- Explosives
- Lachrymators
- Lecture Bottles
- Shock Sensitive
- Toxic Materials



**CHEMICAL  
ASSISTANCE**

**ENVIRONMENTAL**

**NETWORK**

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### **Chemical Assistance, Inc.**

will assist you in solving your chemical waste removal problems.

#### ***Materials Identification***

Our team of experts will identify the materials to be disposed of and the proper techniques and regulations to follow. Experienced chemists will conduct the necessary tests to access the best available removal option.

#### ***Documentation***

Our service coordinators will work with you to satisfy all Federal, State and Local regulatory requirements providing completed labels and manifests in advance of transportation. We can help you meet all regulatory requirements accurately, effectively and economically.

#### ***Reclamation***

Environmental legislation coupled with shrinking disposal capacity make reclamation the alternative for the future. Our capabilities include the production of supplemental fuels, reclamation of heavy metals and the salvage and recycling of most chemicals.

Chemical Assistance, Inc. specializes in the packaging, removal, and final disposition of chemicals and waste materials. This includes the following services:

- All necessary analysis
- Proper classification and characterization of your waste
- A careful review of your waste disposal options
- Transportation of your materials by a licensed, permitted and insured transporter
- Final disposition of all your waste materials through recycling, beneficial reuse, and/or treatment.



**Chemical Assistance, Inc.**

3157 Packard Road, Suite A  
Ann Arbor, MI 48108  
1-800-535-6650  
Fax: (313) 677-0414



a division of the  
Environmental Network

Let **Chemical Assistance** be your environmental management team. To ensure that you receive the quality and environmentally sound service you require, call

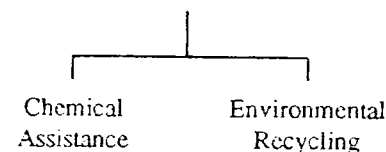
**1-800-535-6650**

or write

**Chemical Assistance, Inc.**  
**3157 Packard Road**  
**Suite A**  
**Ann Arbor, MI 48108**

*Chemical Assistance, Inc.*  
*is a division of the*  
*Environmental Network*

### **Environmental Network**



GREEN COPY    RETAIN FOR YOUR FILE



# WARNING-HAZARDOUS MATERIALS

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible pencil, or in carbon and retained by the Agent. —ORIGINAL—NON NEGOTIABLE

Shipper's No. 29616

Carrier's No. \_\_\_\_\_

NAME OF CARRIER Chemical Assistance, Inc.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

AT

FROM

Date June 16, 1992

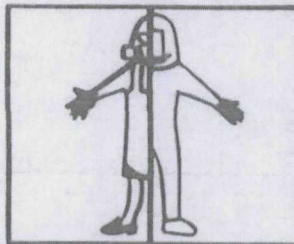
The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as shown below, which said company (the word company being understood through this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own railroad, water line, highway route or routes, or within the territory of its highway operations, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all conditions not prohibited by law, whether printed or written, herein contained, including the conditions on the back hereof, which are hereby agreed to by the shippers and accepted for himself and his assigns.

CONSIGNEE TO <u>Environmental Network, Inc.</u>	EXEMPTION #	SEAL #
ADDRESS <u>221 Dino Drive Suite B</u>	ROUTE	FINAL DESTINATION
CITY <u>Ann Arbor</u> STATE <u>MI</u> ZIP <u>48103</u>	INTERLINE CARRIER	
EMERGENCY CONTACT: (800) - <u>535-6650</u>	CAR OR VEHICLE LICENSE #	NO.

NO. & TYPES OF PKGS.	HAZ. MAT.	PROPER DOT SHIPPING NAME AS SHOWN IN 172.101 49CFR (See back for emergency response info)	CONSTITUENTS WHEN N.O.S SHIPPING NAME USED IN PARENTHESES	HAZARD CLASS UN/NA NUMBER(S)	*"POISON" & "INH. HAZARD" IF LC50. NAMES OF HAZARDOUS SUBSTANCE(S) IF "RO"	*WEIGHT (SUBJECT TO CORRECTION)	"RO" VALUE & EMERGENCY RESP. GUIDE #
1	X	Combustible Liquid, NOS	( Lab Pack Guide 27 )	Combustible Liquid NA 1993	None	10 pounds	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
2	X	Corrosive Liquid, NOS	( Lab Pack Guide 60 )	Corrosive Liquid UN 1760	None	26 pounds	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
1	X	Oxidizer Material, NOS	( Lab Pack Guide 35 )	Oxidizer UN 1479	None	20 pounds	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #
4		Non-Regulated Materials	( Lab Pack )	None	None	21 pounds	<input type="checkbox"/> 1 <input type="checkbox"/> 1000 <input type="checkbox"/> 10 <input type="checkbox"/> 5000 <input type="checkbox"/> 100 <input type="checkbox"/> ERG #

WHERE CHECKED-USE THE PROTECTIVE EQUIPMENT AND CLOTHING IF EXPOSED TO THIS MATERIAL IN USE OR IN AN EMERGENCY

- ☐ Hard Hat
- ☒ Safety Glasses
- ☐ Safety Goggles
- ☐ Full Face Shield
- ☒ Protective Gloves
- ☐ Splash Apron
- ☐ Protective Boots



- ☐ Respiratory Protection
- ☐ Air-purifying Respirator Type \_\_\_\_\_
- ☐ Fully Encapsulated Suit
- ☐ Atmosphere-Supplying Respirator Type \_\_\_\_\_

WHEN "RO" QUANTITY RELEASED INTO ENVIRONMENT, IMMEDIATELY NOTIFY NAT. RESPONSE CENTER - 800-424-8802 AND 911 EMERGENCY SYSTEM OR LOCAL OPERATOR.

SPECIAL MARKINGS OR INSTRUCTIONS

SHIPPERS CERTIFICATION This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Signature Alf. Hays Title Chemist

"If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight." NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \_\_\_\_\_ per \_\_\_\_\_

Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Signature of consignor

If charges are to be prepaid write or stamp here "To be Prepaid."

Received \$\_\_\_\_\_ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per \_\_\_\_\_ (The signature here acknowledges only the amount prepaid)

Charges advanced: \$\_\_\_\_\_

C.O.D. charge to be paid by Shipper ☐

Consignee ☐

PLACARDS PROVIDED OR AFFIXED

N/A

SHIPPER'S CHECK LIST

<input checked="" type="checkbox"/> DOT LABELS APPLIED AND SECURE	<input checked="" type="checkbox"/> DOT AUTHORIZED CONTAINERS
<input checked="" type="checkbox"/> PROPER DOT NAME ON ALL PACKAGES	<input checked="" type="checkbox"/> CHECKED FOR PROPER SEALING

EMERGENCY RESPONSE INFORMATION (ERG) IN VEHICLE

SHIPPER Henry Ford Community College

ADDRESS 5101 Evergreen

CITY Dearborn

STATE MI 48128

TELEPHONE (313)845-9658

PER

PERMANENT POST OFFICE ADDRESS OF SHIPPER

AGENT Mr. Fred Steiner

PER PO 98713

NUMBER

2

Transportation Skills Program™  
243 West Main Street  
Kutztown, Pennsylvania 19530  
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SIGNATURE

Joseph M. Maschall

PRINTED

# HAZARDOUS MATERIALS

**Exhibit B**

**SUMMARY OF MANIFESTS**

DATE	SHIPPED TO	QUANTITY	MATERIAL
12/14/90	Unknown	25 containers/ 90 lbs	Non-hazardous, non-regulated biological specimens (e.g., animal parts)
1/23/91	Unknown	3 containers/ 306 lbs	Non-hazardous, non-regulated biological specimens (e.g., animal parts)
4/2/91	Unknown	1 container/50 lbs;	Non-hazardous, non-regulated blood samples
	Unknown	1 container/25 lbs	Non-hazardous, non-regulated needles, syringes, and vacutubes
9/24/91	Unknown	24x36 box	Non-hazardous, non-regulated needles, syringes
6/16/92	Unknown	1 container, 10 lbs	Combustible liquid, NOS, NA1993 Lap Pack Guide 27
	Unknown	2 containers/26 lbs	Corrosive liquid, NOS, UN1760, Lab Pack Guide 60
	Unknown	1 container/20 lbs	Oxidizer material, NOS, UN1479, Lab Pack Guide 35
	Unknown	4 containers/21 lbs	Non-hazardous, non-regulated material Lab Pack

**FIRST CLASS MAIL**

**BUTZEL LONG**  
ATTORNEYS AND COUNSELORS

STONERIDGE WEST  
41000 WOODWARD AVENUE  
BLOOMFIELD HILLS, MI 48304

TO:

Ms. Marsha Adams  
U.S. Environmental Protection Agency  
Enforcement Services Section 1, ~~SE-5~~  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

*SR-60*  
FIRST CLASS MAIL